



# National Association of Conservation Districts

July 3, 2019

Policy and Program Analysis Division  
Natural Resources Conservation Service  
United States Department of Agriculture  
14th and Independence Ave, SW  
Room 6008-S  
Washington, DC 20250

Submitted electronically via regulations.gov

Docket ID USDA-2019-0005

## **RE: Comments on the Interim Rule for Miscellaneous Conservation Provisions**

To Whom It May Concern:

The National Association of Conservation Districts (NACD) represents America's 3,000 locally-led conservation districts, working with millions of landowners and operators to help them manage and protect land and water resources on private and public lands. Established under state law, conservation districts share a single mission: to work cooperatively with federal, state and other local resource management agencies and private sector interest groups to provide technical, financial and other assistance to help landowners and operators apply conservation to the landscape.

NACD is glad to see the Natural Resources Conservation Service (NRCS) act quickly to implement changes in the 2018 Farm Bill, and we appreciate the opportunity to comment on these changes. In particular, we would like to offer comments on proposed changes to State Technical Committees, Technical Service Provider (TSP) certification and the Watershed Protection and Flood Prevention Program.

### **State Technical Committees**

State Technical Committees play a critical role in advising NRCS and supporting locally-led conservation. NACD was glad to see the 2018 Farm Bill reaffirm the importance of State Technical Committees and continue the tradition of implementing conservation that responds to local needs and resource concerns. State Cooperative Extension Services and land-grant universities are important local partners, and we are glad to see their role in State Technical Committees formally codified in regulation.

As NRCS continues to implement the 2018 Farm Bill and writes new program rules, we urge the agency to maintain strong, locally-led conservation. The State Technical Committees and Local Working Groups, no matter how well-constructed they may be, are most effective when they are given the space to set local priorities and respond to local concerns.

Congress specifically referenced the need to utilize State Technical Committees and through them, Local Working Groups to help implement several new changes included in the 2018 Farm Bill. State Technical Committees will be involved in the creation of the Soil Health and Income Protection (SHIP) pilot program, the identification of practices within the Environmental Quality Incentives Program (EQIP) to



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receive higher payments, and the review of project applications in the now larger state pool within the Regional Conservation Partnership Program (RCPP). Empowering State Technical Committees and Local Working Groups will be necessary to ensure this change in membership makes a meaningful difference on the ground.

### **Technical Service Provider (TSP) Certification**

Technical Service Providers (TSP) fill a valuable role delivering specific conservation assistance to landowners. They provide important additional capacity for targeted conservation activity plans, and along with NRCS staff, can work with producers to expand the adoption of conservation practices across the country.

We are glad to see NRCS looking at alternatives for certifying TSPs. We have heard from individuals on the ground that certification can be a bottleneck for adding TSP capacity. However, we are also glad to see NRCS take a conservative approach to third-party TSP certification. Since this is such a new approach, we believe that beginning with a small number of trusted partners to certify TSPs is appropriate. If this approach is successful, then NRCS may choose to expand on it. However, allowing unprepared organizations to certify TSPs could undermine the entire TSP program as well as the trust in the NRCS programs being supported.

Although NACD supports the use of TSPs as a way to enhance the work NRCS and conservation district staff are doing, it is also important to note that TSPs are not a substitute for NRCS or conservation district staff in field offices. NRCS and conservation district staff have authorities and can undertake a much broader set of responsibilities. TSPs should be seen as a complement to, rather than a substitute for, NRCS and conservation district field staff. In addition, TSPs should be working under the supervision of trained, experienced conservation planners. We strongly urge NRCS to continue hiring additional field staff to meet the need for conservation on the ground.

Thank you again for the opportunity to provide input as you and your team implement the 2018 Farm Bill and for your commitment to voluntary, locally-led conservation. We stand ready to assist in any way needed.

Sincerely,

A handwritten signature in black ink that reads "Tim Palmer".

Tim Palmer  
President  
National Association of Conservation Districts